

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION

- - -
EQUAL EMPLOYMENT : CIVIL NO.
OPPORTUNITY COMMISSION:
and :
KATHY C. KOCH :
INTERVENOR/PLAINTIFF: :
v :
L.A. WEIGHT LOSS :
CENTERS, INC. :
Defendant : WDQ-02-CV-648

- - -
OCTOBER 27, 2004
- - -

30(b)(6) oral deposition of L.A.
WEIGHT LOSS CENTERS INC., taken through
its representative, KAREN SIEGEL, taken
pursuant to notice, was held at the law
offices of WOLF, BLOCK SCHORR &
SOLIS-COHEN, 1650 Arch Street, 2nd Floor,
Philadelphia, PA, beginning at 10:32
a.m., on the above date, before Nancy D.
Ronayne, a Court Reporter and Notary
Public in the Commonwealth of
Pennsylvania.

- - -
ESQUIRE DEPOSITION SERVICES
15th Floor
1880 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103
(215) 988-9191

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1 Q. Dated April 21st?
 2 A. April 21st, yes.
 3 Q. Thank you. Let me mark as
 4 Exhibit 11 a personnel document, a
 5 vacation slash sick log that I will
 6 represent to you has come from Lynne
 7 Portlock's personnel file, indicating
 8 that her planned vacation in July was not
 9 to take place but instead she would be
 10 using vacation days on May 21, May 22,
 11 June 3, 4, 5, June 8, 9, 10, 11.
 12 (Siegel-11 marked for
 13 identification.)
 14 BY MS. WHITE:
 15 Q. Did you have any
 16 discussions with anyone at L.A. Weight
 17 Loss about Lynne Portlock's employment or
 18 her leave time in April or May of 1998?
 19 A. Not that I recall.
 20 Q. Do you recall that
 21 Portlock's position was changed in the
 22 summer of 1998?
 23 A. Not specifically.
 24 Q. Do you recall whether

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1 Portlock was disciplined in any respect
 2 on account of her conduct in terminating
 3 Kathy Koch?
 4 A. No, not that I recall.
 5 Q. Who was Lynne Portlock's
 6 direct supervisor in the summer of 1998?
 7 A. I believe that would have
 8 been Eileen Stankunus.
 9 Q. Did you speak with Eileen
 10 Stankunus in the summer of 1998, the
 11 spring or summer of 1998, about Lynne
 12 Portlock's employment status.
 13 A. Possibly. I don't have a
 14 specific recollection.
 15 Q. Where would you look, where
 16 could you look to refresh your
 17 recollection?
 18 A. There would-- it would be
 19 notated in Lynne's file, Lynne's
 20 personnel file.
 21 Q. Do you recall having any
 22 discussions with Eileen Stankunus or
 23 Scott Moyer or Vahan Karabajakian about
 24 disciplinary concerns associated with or

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1 surrounding Lynne Portlock and her
 2 termination of Kathy Koch?
 3 A. No.
 4 MS. WHITE: This is going to
 5 be 12.
 6 (Siegel-12 marked for
 7 identification.)
 8 BY MS. WHITE:
 9 Q. Did you get a copy of
 10 Exhibit 12.
 11 A. Yes.
 12 Q. This letter instructs or
 13 advises that Ms. Koch was terminated for
 14 poor performance; is that a conclusion
 15 that you made?
 16 A. Yes.
 17 Q. And you made that conclusion
 18 for the company?
 19 A. Yes.
 20 Q. And you made that conclusion
 21 on June 4th on the basis of your
 22 investigation between the end of April or
 23 early May 1998 and early June of 1998?
 24 A. Yes.

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1 MS. WHITE: This will be
 2 number 13.
 3 (Siegel-13 marked for
 4 identification.)
 5 BY MS. WHITE:
 6 Q. Did you receive the charge
 7 of discrimination and notice of the
 8 charge of discrimination appended to
 9 Exhibit 13 in June of 1998?
 10 A. Yes.
 11 Q. And you sent the charge to
 12 company counsel, Mr. Landau?
 13 A. Yes.
 14 Q. Upon your receipt of the
 15 charge did you undertake any further
 16 investigation of Koch's employment, her
 17 discharge from employment or her claim of
 18 retaliatory dismissal?
 19 MR. LANDAU: I think it's
 20 been asked and answered but you
 21 can answer again.
 22 THE WITNESS: Just insofar
 23 as reviewing the information that
 24 was obtained originally,